

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

DIARIO EL PAIS, S.L. and PRISACOM, S.A.,

Plaintiffs,

v.

THE NIELSEN COMPANY (US), INC.,

Defendant.

07-CV-11295 (HB)

REPLY DECLARATION OF WILLIAM J. TAYLOR, JR.

WILLIAM J. TAYLOR, JR. declares pursuant to 28 U.S.C. § 1746:

1. I am an attorney associated with the law firm of Paul, Weiss, Rifkind, Wharton & Garrison LLP, 1285 Avenue of the Americas, New York, New York 10019-6064, counsel for defendant The Nielsen Company (US), Inc. in the above-captioned action.

2. Attached hereto as Exhibit A is a true and correct copy of the document available at http://www.netratings.com/downloads/us/NetView_US.pdf (last visited May 15, 2008).

I declare under penalty of perjury that the foregoing is true and correct.

Executed in New York, New York
May 15, 2008

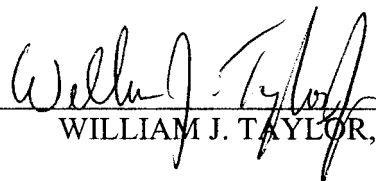

WILLIAM J. TAYLOR, JR.

Exhibit A



> NetView

The Benchmark for Internet Audience Measurement



Identify and Understand Your Online Audience

NetView, the syndicated audience measurement service from Nielsen Online, provides in-depth perspective on the online consumer and digital universe through panel-based projections of Web site audiences, including traffic volume, and demographics. Based on data collected from our media quality panel, NetView tracks and reports across Web sites and Internet applications, providing you with keen insight into online consumer behavior.

A True Reflection of User Activity

NetView's unique, patented desktop meter can accurately identify which browser, tab, Internet application (such as media players, instant messaging, etc.), or desktop application is in focus. In this way, NetView can accurately credit time spent—a major indicator of user loyalty. Our patented prompting technology also credits traffic to the correct user within those households having multiple online users.

Use NetView to:

- Compare your Web site's audience metrics to other sites in a specified category
- Compare audience size and activity across sites
- Trend site audience metrics over time
- Identify the best sites for reaching demographic targets
- Analyze site traffic by section, subdomain, referrals, and top pages
- Fully understand your online audience:
 - How much time did they spend?
 - How many pages did they view?
 - How many sessions did they have?

Flexible, Detailed Reports

NetView's Web interface makes it easy to run weekly or monthly reports based on a customized site list, category/subcategory definitions, or across all sites. Demographic, and referral/destination/top page drilldowns provide the details behind the topline numbers. URLs and Internet applications are aggregated into three distinct levels: company level (Parents) and two site/advertising-entity levels (Brands and Channels) for more recognizable and relevant site analysis. With The Report Manager, frequently used site lists, demo targets, or reports can be saved. Saved reports can also be automatically sent to e-mail in Excel once new data is available.

Additionally, as a client you have direct access to the Nielsen Online analytics team. With years of expertise in market research, media measurement and Internet research, our analysts can help you turn NetView data into custom reports, which can form a strong foundation for your strategic business decisions.

For many years, we have trusted NetView to provide us with accurate audience measurement data, including historical trends, which are crucial to our media strategy and our understanding of the competitive landscape. When important business decisions are on the line, the validity of your market research information is paramount. We feel confident knowing that NetView has a history of high quality data collection and is a widely respected third-party source for Internet audience measurement.

Shane McGalloway
VP Market Research and Analysis, Ask.com



Available Audience Reports Include:

Site Metrics

- Standard metrics (unique audience, page views, time spent, etc.)
- Access location (combined home & work vs. home vs. work)*
- Trend report (over last 13 months or 8 weeks)
- Unduplicated audience
- Audience overlap

Loyalty*

- Loyalty indicators (share of active days, retention, etc.)
- Frequency (1 – 10+ sessions/visits)
- Stickiness (< 5 seconds – 61+ minutes)
- Loyalty matrix (bubble chart of average number of visits and time spent)

Demographic

- Key demos (reach across key gender/age breakdowns)
- Demo targeting
- Audience profile

Audience Summary

- Active Universe Profile
- Daily/Hourly Traffic
- Average Usage

Compile and Manage Site Lists Easily

- Comprehensive Site Search covers all reported levels
- Search includes Unique Audience and Category information for easier site recognition
- Use Report Results to build a Site List
- Save up to 20 Site Lists for future use (up to 100 sites per list)

Focus on Report Results Relevant to You

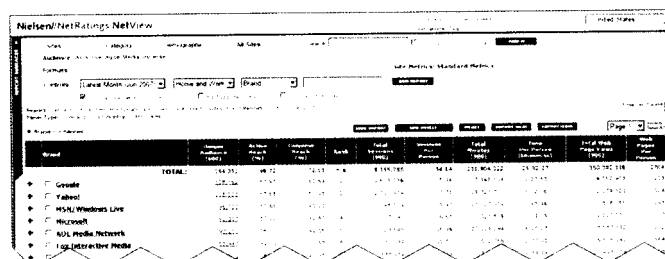
NetView's Report Manager provides easy access to site lists, reports and target audiences.

- Save up to 20 reports and targets
- Set saved reports to e-mail results when data updates

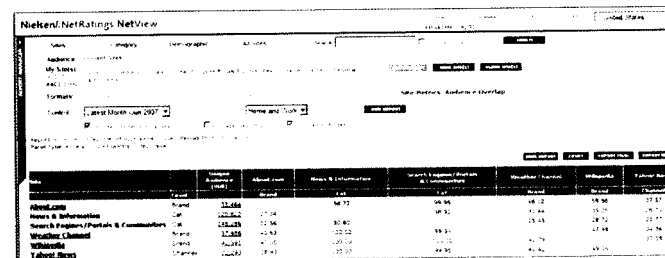
Other report features include:

- Filter results to only Ad-Supported Sites
- Fixed column headers for easy scrolling and viewing
- Print-friendly view and exporting for every report

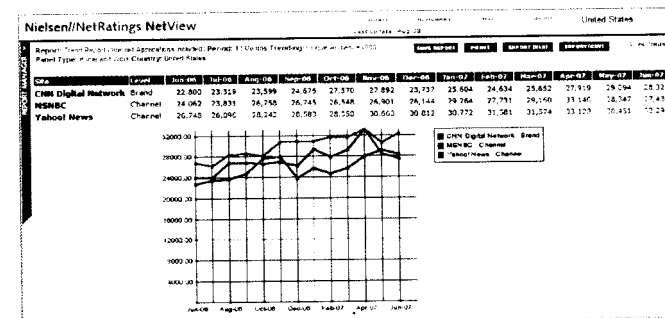
* US ONLY



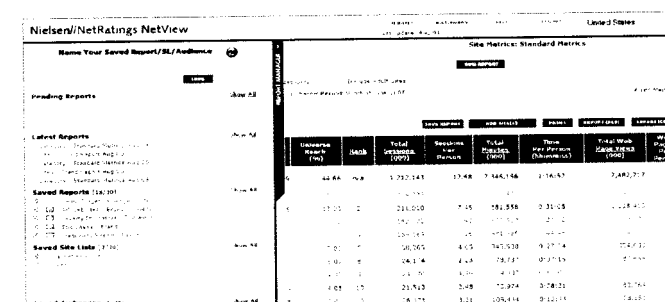
Standard Site Metrics Report



Audience Overlap Report displays percentage of an audience visiting other sites within specified site selection



Trend Report



Report Manager

Drawn from the world's largest Internet panel generated through random digit dial (RDD) recruitment, NetView combines more than 50 years of best practices in audience measurement research with advanced tracking technology.

For more information, contact us at sales.us@netratings.com, or visit www.nielsen-online.com